

## **REMARKS**

Claims 1-4, 6, 8-12 and 14-33 are pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 103(a) Rejection:**

The Office Action rejected claims 1-4, 6, 8-12 and 14-33 under 35 U.S.C. § 103(a) as being unpatentable over Hoover et al. (U.S. Patent 5,724,575) (hereinafter “Hoover”) in view of Dutcher et al. (U.S. Patent 6,269,405) (hereinafter “Dutcher”). Applicants respectfully traverse this rejection for at least the reasons presented below.

Regarding claim 1, Hoover in view of Dutcher fails to teach or suggest an identity index that includes a virtual identity that is for a user of multiple computer resources and includes a plurality of information object identifiers each corresponding to a respective information object; and for each information object, the virtual identity includes a resource name identifying one of the multiple computer resources at which the respective information object is located. In other words, the virtual identity of Applicants’ claim is for a user of multiple computer resources and includes (for each information object) a resource name identifying one of *the* multiple computer resources (at which the information object is located). Thus, according to claim 1, the resource name in the virtual identity must identify one of the multiple computer resources (i.e., one of the computer resources identified in “a virtual identity for a user of multiple computer resources ...” from Applicants’ claim). Such a virtual identity is not taught or suggested by the cited art, whether considered singly or in combination.

The Examiner relies on Hoover’s homogenous data model interfacing over multiple, heterogeneous, remote data collections and providing an object broker that stores location and status information regarding the remote data combined with Dutcher’s teaching regarding updating remote user accounts based on user account information on a

central server. However, Hoover and Dutcher, whether considered singly or in combination, do not teach or suggest the limitations of claim 1.

Firstly, Applicants respectfully disagree with the Examiner's interpretation of Hoover. Hoover teaches a system in which data regarding various subjects, such as health care information, is distributed over various, heterogeneous data collections. Hoover's system overlays a homogenous data model over the multiple, heterogeneous, remote data collections and provides an object broker that stores location and status information regarding the remote data. Hoover's system allows users of the databases to access new data sources as they come online, without requiring the users (or the users' computers) to know the routing address or other identifying information about the new data source. Hoover describes his system using an exemplary health care system. The data stored in Hoover's system relates to the patients of the health care system, and not to a user of multiple computer resources (i.e., Hoover's data collections). In Hoover, the users of the computer resources (e.g., the computer system on which Hoover's data collections reside) are the employees of the healthcare-related service providers that collect and use the data in Hoover's databases (Hoover, column 27, lines 25-55; column 45, line 46 – column 46, line 19; and column 47, line 55 – column 48, line 3). However, the alleged virtual identities in Hoover do not correspond to these users.

In fact, Hoover specifically states that the users of the databases are not the people whose information is stored in the databases. For instance, Hoover describes an example in which a new record is added in a remote database by using an add\_PERSON message. The add\_PERSON message may include a security password of the computer user initiating the new record. Hoover specifically states that the MyPassword parameter of the add\_PERSON message "*indicates a security password for the user initiating the operation, which is of course unrelated to the information associated with the person whose demographics are being added*" (Emphasis added, Hoover, column 29, lines 46-57). Thus, Hoover explicitly teaches that the user of the resources (the data sources on the remote computers) is **not** the person that is associated with any particular object identity or object attribute. Therefore, Hoover's system does not include, nor does

Hoover disclose, a virtual identity for a user of one or more resources and that includes a resource name, for each information object, that identifies one of the one or more resources (used by the user) at which the respective information object is located, as recited in Applicants' claim.

The Examiner argues that Hoover "teaches a virtual identity is for a user" citing col. 27, lines 34-37 (Final Action, p. 3). At the Examiner's cited passage, Hoover describes a PERSON object attribute table located at computers respectively associated with an insurance company, an employer, a hospital and a PPO/HMO/TPA. However, as demonstrated in Applicants' previous response, the Examiner is confusing Hoover's *data about people* (e.g., patent health care information) with a virtual identity for a user of multiple computer resources that includes a resource name identifying one of the multiple computer resources at which the respective information object is located. In other words, rather than simply requiring data about a person, as taught by Hoover (even in view of Dutcher), Applicant's claim requires a specific arrangement including a resource name identifying one of the multiple computer resources (i.e., used by the user of "a virtual identity for a user of multiple computer resources").

Furthermore, as shown previously, the data objects of Hoover relied on by the Examiner do not include a virtual identity for a user of multiple computer resources. Instead, Hoover makes it very clear that the users of his database are the health care professionals and that any data about the user, such as password information "which is of course unrelated to the information associated with the person whose demographics are being added" (Hoover, column 29, lines 46-57). In other words, the information stored in Hoover's database, including the data of the PERSON object attribute table cited by the Examiner, is unrelated to the users of Hoover's system. Hence, Hoovers' PERSON object attribute table, even if modified in view of Dutcher, cannot be considered a virtual identity for a user of multiple computer resources as recited in Applicants' claim (i.e., a virtual identity that also includes, for each information object, a resource name identifying one of the multiple computer resources).

The Examiner further asserts that Hoover's "information objects comprise user accounts" (Final Action, p. 3), citing col. 27, lines 43-49 and arguing that Hoover's "information object ... comprises a person's account with an insurance company, health maintenance organization, etc." (Final Action, p. 3). However, Hoover's database of healthcare information about people is not the same as, nor does it suggest, even if modified in view Dutcher, the virtual identity of Applicants' claim.

As noted above, information about a person, including information about health care policies, is not the same as, nor does it suggest, a virtual identity for a user of *multiple computer resources* that includes both a plurality of information object identifiers each corresponding to a respective information object and, for each information object, a resource name *identifying one of the multiple computer resources* at which the respective information object is located, as recited in claim 1.

Additionally Dutcher's system does not include a virtual identity as recited in Applicants' claim. Instead, Dutcher teaches a system for establishing and synchronizing associated user accounts on managed servers based on user account information on a central server. Dutcher's system does not include, nor does the Examiner cite, any data structure that can be considered a virtual identity for a user of multiple computer resources that includes, among other things, a resource name identifying one of the multiple computer resources at which the respective information object is located. In contrast, Dutcher teaches a system in which user records are stored both on a central server and on one or more managed servers. Dutcher teaches that periodically, based on updates to the user accounts on the central server, the database of user accounts on the central server is synchronized with the corresponding database of user accounts on the managed servers. Dutcher makes no reference to, nor does Dutcher system require, include or suggest, even in view of Hoover, a virtual identity for a user of multiple computer resources, including the specific limitations recited in claim 1.

Dutcher teaches that the user accounts on the managed servers are synchronized with those on the central server. Dutcher is not concerned with, nor does Dutcher teach,

any sort of particular data structure or arrangement for the user accounts. Furthermore, there is no need for a virtual identity as recited in Applicants' claim in Dutcher's system. Dutcher teaches the user of a managed service on a managed server that receives user account updates and synchronizes a local database of user accounts with those received from the central server (Dutcher, col. 7, lines 15-34 and 39-59). In other words, Dutcher teaches that changes to a set of user accounts, such as user names and passwords, are sent from a central server to a managed server and that a managed service on the managed server then compares the updates to the user accounts on the managed server in order to synchronize them with the central server. No sort of virtual identity, such as that recited in claim 1, is required, included or suggested by Dutcher's system.

As shown above, Hoover and Dutcher, whether considered singly or in combination, do not teach or suggest the specific limitations of claim 1. Therefore, no combination of Hoover and Dutcher would include the virtual identity recited in Applicants' claim. Contrary to the Examiner's assertions, modifying Hoover in view of Dutcher would not change the nature or structure of Hoover's database. For example, Hoover specifically and clearly states that the information stored in his database is *unrelated to any information, such as account and password information, about the users of Hoover's system* (Hoover, column 29, lines 46-57). Hence, even if the user account management of Dutcher were applied to Hoover's system, the resulting system would only include the homogeneous data model for healthcare information and the ability to use user account information on a central server (e.g., user accounts for the healthcare professionals using Hoover's system) to establish and synchronize associated user accounts on other servers.

Additionally, even if Hoover's system is modified to store information about computer user accounts, as suggested by the Examiner, the user account information that would be stored in Hoover's database would still be *unrelated to any information about the user's of the database*, as taught by Hoover (column 29, lines 46-57). In other words, if Hoover's system were to be used to store a homogeneous data model of user account information, *according to the teachings of Hoover* the user account information stored in

the database would not include a virtual identity for a user of computer resources for which information, such as information object identifiers each corresponding to a respective information object, for each of which, the virtual identity includes a resource name identifying of the computer resources used by the user, as recited in Applicants' claim. Moreover, **Hoover clearly teaches away** from the combination suggested by the Examiner. Thus, the Examiner's combination of Hoover in view of Dutcher is improper. It is improper to combine references where the references teach away from their combination. *In re Grasselli*, 218 USPQ 769, 779 (Fed. Cir. 1983).

Furthermore, the Examiner has not provided a valid reason why one would modify the system of Hoover to include the teachings of Dutcher. The Examiner states that "Dutcher describes a need for managing different user accounts on multiple, heterogeneous computer resources based on a single user account definition" (citing col. 1, lines 37-47) and that "the teachings of Hoover enable the management of different, heterogeneous database on multiple, computer resources based on a single, homogeneous data model" (Final Action, pp. 3-4). The Examiner then simply concludes, "[t]herefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to implement the teachings of Hoover such that the virtual identity is 'for a user of multiple computer resources,' as Dutcher suggests" (Final Action, p. 4). However, the Examiner fails to actually provide a reason while one would modify the teachings of Hoover, rather than simply use the account management solution of Dutcher. In fact, not only does Dutcher "describe a need for managing different user accounts" as argued by the Examiner, Dutcher clearly provides, and in fact is solely concerned with, providing a system specifically for managing different user accounts. The Examiner has simply restated the goal of Dutcher's system. The Examiner has not provided any reason why one would modify the healthcare database system of Hoover to include the user account synchronization system of Dutcher.

The rejection of claim 1 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 20 and 26.

## CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-96802/RCK.

Respectfully submitted,

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